

1,3 BUTYLENE GLYCOL - ENVIRONMENTAL IMPACT

FAP 2196

I. Environmental Impact Analysis Report

An exemption from the requirement to prepare an environmental impact analysis report is requested under 21 CFR 25.1 (f)(1)(iv). An environmental impact analysis report should not be required since: a) 1,3 butylene glycol is composed of a substance or its derivative that naturally occurs in the environment and that may reasonably be considered to be nontoxic in the amounts used; b) it is metabolized to carbon dioxide and water, naturally occurring in the environment and considered to be non-toxic; and c) the use of 1,3 butylene glycol can reasonably be expected on the basis of all available evidence, not to alter significantly the prevalence and/or distribution of the substance or its derivatives or their metabolites in the environment.

II. Analysis of the Environmental Impact of the Manufacturing Process of the Article

A. Identification of pollutants expected to be emitted.

The waste water and solid waste streams produced from the 1,3 butylene glycol process are all in compliance with Texas Water Quality Board Requirements. Listed below are the sources of the waste streams, type of treatment and regulatory body in charge of disposal:

Waste Water Source	Type of Disposal	Responsible
Organics-Rich Heavy Ends	Incineration	Texas Air Control Board
Aqueous Waste	Treatment via Activated Sludge	Texas Water Board & EPA
Spent Heavy Metal Catalyst	Landfill	Texas Water Quality Board

B. Applicable Federal, State and Local Emission Requirements

1,3 butylene glycol is currently manufactured by Celanese Chemical Company at the Bishop, Texas Chemical Company plant. The air emissions from the 1,3 butylene glycol process at the Bishop, Texas plant are in compliance with Regulation V "Control of Air Pollution from Volatile Organic Carbon Compounds" of the Texas Air Control Board.

Treated waste water from the 1,3 butylene glycol is in compliance with the Texas Water Quality Board Waste Control Order Permit Number 00579 and with the proposed National Pollution Discharge Elimination Systems Permit Number TX0006025.

C. Certification

We hereby certify that the described emissions are in compliance with the cited requirements.



Celanese Chemical Corporation

mas#173

000147

October 22, 1985
JDW-108-85

Michaeleen E. Linahan
Registrations Coordinator
American Cyanamid Company
Agricultural Research Division
PO Box 400
Princeton, NJ 08540

Dear Ms. Linahan:

Per your request and our discussion, this letter addresses our assessment of the potential environmental impact of 1,3-butylene glycol and a listing of applicable regulations.

I. ENVIRONMENTAL IMPACT ANALYSIS

An exemption from the requirement to prepare an environmental impact analysis report is requested under 21 CFR 25.1(f)(1)(iv). An environmental impact analysis report should not be required since:

- a) 1,3-butylene glycol is composed of a substance, or its derivative, that naturally occurs in the environment and that may reasonably be considered to be non-toxic in the amounts used;
- b) it is metabolized to carbon dioxide and water, naturally occurring in the environment and considered to be non-toxic; and
- c) the use of 1,3-butylene glycol can reasonably be expected, on the basis of all available evidence, not to alter significantly the prevalence and/or distribution of the substance or its derivatives or their metabolites in the environment.

II. ANALYSIS OF THE ENVIRONMENTAL IMPACT OF THE MANUFACTURING PROCESS OF THE ARTICLE

A. Identification of pollutants expected to be emitted.

The waste water and solid waste streams produced from the 1,3-butylene glycol process are all in compliance

with Texas Water Commission and EPA requirements. Listed below are the sources of the waste streams, type of treatment and regulatory body in charge of disposal.

<u>Waste Water Source</u>	<u>Type of Disposal</u>	<u>Responsibility</u>
Organics-rich heavy ends	Incineration	Texas Air Control Board and Texas Water Commission
Aqueous waste	Treatment via activated sludge	Texas Water Commission and EPA
Spent Heavy metal catalyst	Landfill	Texas Water Commission

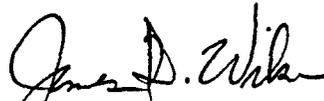
B. APPLICABLE FEDERAL, STATE AND LOCAL EMISSION REQUIREMENTS

1,3-Butylene glycol is currently manufactured by Celanese Specialties Operations at the Bishop, Texas plant. The air emissions from the 1,3-butylene glycol process at the Bishop, Texas plant are in compliance with Regulation V, "Control of Air Pollution from Volatile Organic Carbon Compounds" of the Texas Air Control Board.

Treated waste water from the 1,3-butylene glycol is in compliance with the Texas Water Commission Permit Number 00579 and with the EPA National Pollution Discharge Elimination Systems Permit Number TX0006025.

C. CERTIFICATION

We hereby certify that the described emissions are in compliance with the cited requirements.



J.D. Wilson
Product Safety Coordinator

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